

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JACOB BRADLEY DEMARIAS,

Defendant.

Case No. 1:21-cr-130

MOTION FOR EXTENSION

The United States of America, by Mac Schneider, United States Attorney for the District of North Dakota, and Gary L. Delorme, Assistant United States Attorney, hereby moves for an extension of time within which to file its response to defendant's Motion for Compassionate Release under 18 U.S.C. § 3582(c) (Doc. 75) from February 18, 2024, to March 20, 2024, for the following reasons:

1. On January 19, 2024, defendant filed a Motion for Compassionate Release under 18 U.S.C. § 3582(c).
2. The United States' response is due February 18, 2024.
3. The undersigned reached out to the Bureau of Prisons (BOP) on February 5, 2024, to determine whether defendant has exhausted his administrative remedies with the BOP and requested defendant's BOP medical records in this matter. To date, the United States has not received a response from the BOP as it relates to this request.

For the above-stated reasons, the United states respectfully requests a 60-day extension of time to file its response until March 20, 2024.

Dated: February 6, 2024.

MAC SCHNEIDER
United States Attorney

By: /s/ Gary L. Delorme
GARY L. DELORME
Assistant United States Attorney
ND Bar ID 05845
655 First Ave. N. Ste. 250
Fargo, ND 58102
(701) 530-2420
gary.delorme@usdoj.gov
Attorney for United States

CERTIFICATE OF SERVICE

I hereby certify that on 2/6/2024, the above-named document was filed electronically with the Clerk of Court through ECF, and that ECF will send a Notice of Electronic Filing (NEF) to the following:

brandon@brandonsample.com

Dated: 2/6/2024

/s/ Trina Gilhooly

TRINA GILHOOLY

Office of the United States Attorney